



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL CLEANUP

June 30, 2013

Mr. Bob Wyatt
NW Natural
220 NW 2nd Avenue
Portland OR 97209

sent via email only

Mr. Myron Burr
Siltronic Corporation
7200 NW Front Avenue, M/S 20
Portland, Oregon 97210-3676

RE: Clarification regarding Supplemental Investigation Work Plan at U.S. Moorings Site
Gasco Sediments Site

Dear Sirs:

On May 31, 2013, EPA participated in a conference call with NW Natural regarding the requested supplemental investigation of the U.S. Moorings offshore area. During the call, NW Natural highlighted the potential administrative challenges in terms of remedy design if the U.S. Moorings offshore area is included in the Gasco Sediments Site Project Area. In particular, NW Natural pointed out that should remedial alternative evaluation include the U.S. Moorings offshore area, information necessary for the evaluation would need to be procured from the U.S. Army Corps of Engineers (USACE). As a result, this could lead to potential project delays as another party is brought into the process. Additionally, NW Natural's contractor also believed that the design would be required to include the dismantling and reconstruction of the Moorings dock.

EPA is aware of the administrative challenges presented by the involvement of another party in the Gasco remedy design. However, EPA reiterates that the presence of substantial product is a strong line of evidence for potentially including an area in the Gasco Sediments Site Project Area, particularly as the selected remedial action is to include a preference for removal of this material. NW Natural's inclusion of the U.S. Moorings dock area in a remedial design will not include the process of dismantling nor rebuilding the Moorings dock, but would need to include an evaluation of whether the pilings would need to be removed to do a protective cleanup or whether they could remain and consider necessary dock design and use information provided by USACE. The design information to be provided by USACE may include current dock design, new dock design, prop scour information, maintenance dredge depths, etc. EPA will assist in facilitating discussions between NW Natural/Siltronic and USACE to obtain this information, as needed.

The substance of the May 31, 2013 conference call did not modify EPA's position regarding the supplemental investigation of the U.S. Moorings offshore area. As stated in the November 29, 2012 EPA letter, NW Natural can either: 1) accept the findings of EPA's substantial product evaluation and incorporate this information into the Gasco Engineering Evaluation/Cost Estimate

(EE/CA), or 2) conduct additional sampling to verify the presence or absence of substantial product. According to EPA's May 22, 2013 letter, if NW Natural does not agree with EPA's substantial product evaluation, then a work plan detailing additional sampling in the U.S. Moorings offshore area should be submitted per the agreed to schedule (i.e., within 90 days of May 10, 2013).

Please let me know if you have any questions or concerns at (206) 553-1220 or via email at sheldrake.sean@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to be 'SS', with a long horizontal line extending to the right.

Sean Sheldrake, RPM

Cc:

Kristine Koch, EPA
Chip Humphrey, EPA
Mark Ader, EPA
Dana Bayuk, ODEQ
Chris Budai, USACE

via email only